

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
THE REPUBLIC OF KAZAKHSTAN,	:	
	:	
Plaintiff,	:	15 Civ. 1900 (ER)
	:	
-against-	:	
	:	
DOES 1-100 INCLUSIVE,	:	NOTICE OF CROSS
	:	MOTION FOR
	:	<u>EXPEDITED DISCOVERY</u>
Defendants.	:	
	:	
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PLEASE TAKE NOTICE that, upon the Declaration of Jacques Semmelman dated August 21, 2015 and the exhibits thereto, the Declaration of Michael R. Graif dated August 24, 2015 and the exhibit thereto, the Declaration of Iryna Voronov dated August 25, 2015 and the exhibits thereto, the Memorandum of Law in Opposition to Respublika and LLC Media-Consult's Motion for Clarification of Preliminary Injunction Order and in Support of Cross-Motion for Expedited Discovery and all prior pleadings and proceedings herein, Plaintiff The Republic of Kazakhstan will move this Court for an ordering granting expedited discovery, before the Honorable Henry B. Pitman, on a date and time to be determined by the Court, at the United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 500 Pearl Street, New York, NY 10007, Courtroom 18A.

Dated: New York, New York
August 25, 2015

Respectfully submitted,

CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP

By: /s/Jacques Semmelman
Jacques Semmelman (JS 5020)
jsemmelman@curtis.com
Michael R. Graif (MG 4795)
mgraif@curtis.com

101 Park Avenue
New York, New York 10178
(212) 696-6000

Attorneys for Plaintiff The Republic of Kazakhstan